

1 EDMUND G. BROWN JR., Attorney General  
of the State of California

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8 Attorneys for Complainant

9  
10 **BEFORE THE**  
11 **BOARD OF REGISTERED NURSING**  
12 **DEPARTMENT OF CONSUMER AFFAIRS**  
**STATE OF CALIFORNIA**

13 In the Matter of the Petition to Revoke Probation  
Against:

14 LONNIE CHARLES LAUGHLIN  
15 P.O. Box 2  
Potrero, CA 91963  
16 Registered Nurse No. 512650

17 Respondent.

Case No. 2001-178

**PETITION TO REVOKE  
PROBATION**

18  
19 Complainant alleges:

20 **PARTIES**

21 1. Ruth Ann Terry, M.P.H, R.N (Complainant) brings this Petition to Revoke  
22 Probation solely in her official capacity as the Executive Officer of the Board of Registered  
23 Nursing.

24 2. On or about July 11, 1995, the Board of Registered Nursing issued  
25 Registered Nurse License Number 512650 to Lonnie Charles Laughlin (Respondent). The  
26 registered nurse license was in full force and effect at all times relevant to the charges brought  
27 herein and will expire on January 31, 2009, unless renewed.

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6. Section 2811, subdivision (b), provides that the Board may renew an expired license at any time within eight years after the expiration.

7. In a disciplinary action entitled "In the Matter of the Accusation Against Lonnie Charles Laughlin," Case No. 2001-78, the Board of Registered Nursing adopted a Stipulation in Settlement as its final decision in the matter, effective March 3, 2002. The Board's Decision and Order stated that Respondent's registered nursing license was revoked. However, the Board's Decision and Order also stated that, immediately, said revocation was stayed and Respondent's registered nursing license was placed on probation for a period of three (3) years with certain terms and conditions. A copy of that decision is attached as Exhibit A and is incorporated by reference.

“Respondent shall fully comply with the terms and conditions of the Probation Program established by the Board and cooperate with representatives of the Board in its monitoring and investigation of the Respondent's compliance with the Probation Program. Respondent shall inform the Board in writing within no more than 15 days of any address change and shall at all times

1 maintain an active, current license status with the Board, including during any period of suspension.”

2 (b) At all times after the effective date of the Board’s Decision and  
3 Order in Accusation Case No. 2001-78, Condition No. 3 of Respondent’s probation stated:

4 “Respondent, during the period of probation, shall appear in person at  
5 interviews/meetings as directed by the Board or its designated representatives.”

6 (c) At all times after the effective date of the Board’s Decision and  
7 Order in Accusation Case No. 2001-78, Condition No. 4 of Respondent’s probation stated:

8 “Periods of residency or practice as a registered nurse outside of California  
9 will not apply to the reduction of this probationary term. The respondent must provide written  
10 notice to the Board within 15 days of any change of residency or practice outside the state.”

11 (d) At all times after the effective date of the Board’s Decision and  
12 Order in Accusation Case No. 2001-78, Condition No. 12 of Respondent’s probation stated:

13 “If a respondent violates the conditions of his probation, the Board after giving  
14 the Respondent notice and an opportunity to be heard, may set aside the stay order and impose the  
15 stayed discipline (revocation) of the Respondent’s license. If during the period of probation, an  
16 accusation or petition to revoke probation has been filed against the Respondent’s license or the  
17 Attorney General’s Office has been requested to prepare an accusation or petition to revoke probation  
18 against Respondent’s license, the probationary period shall automatically be extended and shall not  
19 expire until the accusation or petition has been acted upon by the Board. Upon successful  
20 completion of probation, the Respondent’s license will be fully restored.”

21 **FACTS**

22 8. On or about May 2, 2003, the Board placed Respondent’s probation on  
23 tolling status, pursuant to Probation Condition No. 4 of the Board’s Decision and Order in  
24 Accusation Case No. 2001-178, because Respondent moved his residence out of the state of  
25 California and into the state of Nebraska. At the time Respondent’s probation was placed on  
26 tolling status, the Board designated that Respondent had completed fourteen (14) months of  
27 probation and he had at least eighteen (18) months of probation remaining.

28 9. On or about March 6, 2007, Respondent notified the Board that he had

1 moved his residence back into the state of California. Respondent also requested that his  
2 probation be taken off tolling status and that he be allowed to complete the remaining months of  
3 probation. However, Respondent failed to notify the Board in writing within fifteen (15) days of  
4 changing his residence and moving his residence back into the state of California.

5 10. In or about March 2007, the Board reactivated Respondent's probation in  
6 response to Respondent's request.

7 11. On or about June 8, 2007, Respondent's Board-designated Probation  
8 Monitor notified Respondent in writing that under the terms of his probation he was required to  
9 attend a meeting with her on June 25, 2007, at the time and place designated in said notice. Said  
10 written notice was sent to Respondent's address of record in California. On June 25, 2007,  
11 Respondent failed to appear at the scheduled meeting with his Probation Monitor as directed in  
12 said notice.

13 12. In a letter to the Board, dated July 2, 2007, Respondent stated that he was  
14 not able to attend or complete the educational courses required under the terms of his probation.  
15 Respondent also stated that, due to the impossibility of completing said required educational  
16 courses and his probation, he intended to retire from his career as a registered nurse and to  
17 voluntarily surrender his registered nursing license.

18 13. On or about July 16, 2007, the Board sent a letter to Respondent which  
19 provided him written notice of his alleged probation violations ("Notice of Violation") and  
20 advised Respondent that the Board was referring the matter to the Attorney General's Office for  
21 further action against his registered nursing license. Said Notice of Violation was sent to  
22 Respondent's address of record via certified and first class mail.

23 14. On or about July 30, 2007, the Board requested that the Attorney General's  
24 Office prepare a Petition to Revoke Probation against Respondent's registered nursing license.

25  
26 **FIRST CAUSE TO REVOKE PROBATION**  
**(Failure to Report in Person at Meeting with Probation Monitor)**

27 15. Respondent's probation is subject to revocation because he failed to  
28 comply with Probation Condition No. 3, referenced above, in that he failed to appear in person at

1 a meeting with a Board representative as directed in writing by the Board. The facts and  
2 circumstances regarding this violation are described in paragraphs 8 through 14, above,  
3 incorporated herein by reference.

4 **SECOND CAUSE TO REVOKE PROBATION**  
5 **(Failure to Provide Timely Written Notice of Change of Residency)**

6 16. Respondent's probation is subject to revocation because he failed to  
7 comply with Probation Condition No. 4, referenced above, in that he failed to notify the Board in  
8 writing within 15 days of any change of residency, as described in detail above in paragraphs 8  
9 through 14, which are incorporated herein by reference.

10 **THIRD CAUSE TO REVOKE PROBATION**  
11 **(Failure to Comply With Probation Program)**

12 17. Respondent's probation is subject to revocation because he failed to  
13 comply with Probation Condition No. 12, referenced above, in that he failed to comply with  
14 Condition No. 3 and Condition No. 4 of his probation, as described in detail above in paragraphs  
15 8 through 14, which are incorporated herein by reference.

16 **DISCIPLINE CONSIDERATIONS**

17 18. To determine the degree of discipline, if any, to be imposed on  
18 Respondent, Complainant alleges that on or about March 3, 2003, in a prior disciplinary action  
19 entitled "In the Matter of the Accusation Against Lonnie Charles Laughlin" before the Board of  
20 Registered Nursing, in Case No. 2001-78, Respondent's license was disciplined for engaging in  
21 unprofessional conduct (conviction of a substantially related crime), in violation of Business and  
22 Professions Code section 2761(f). Respondent's underlying criminal conviction arose from  
23 Respondent's admitted violation of Penal Code section 242 (assault). The circumstances of the  
24 crime for which Respondent was convicted are that on or about June 26, 1999, Respondent hit  
25 J.A. in the head with a flashlight during a verbal altercation following a near traffic accident.  
26 That decision is now final.

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1 PRAYER

2 WHEREFORE, Complainant requests that a hearing be held on the matters herein  
3 alleged, and that following the hearing, the Board of Registered Nursing issue a decision:

4 1. Revoking the probation that was granted by the Board of Registered  
5 Nursing in Case No. 201-78 and imposing the disciplinary order of revocation that was stayed,  
6 thereby revoking Registered Nurse License No.512650 issued to Lonnie Charles Laughlin

7 2. Taking such other and further action as deemed necessary and proper.  
8

9 DATED: 4/1/08

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11   
12 RUTH ANN TERRY, M.P.H, R.N  
13 Executive Officer  
14 Board of Registered Nursing  
State of California  
Complainant

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**Exhibit A**

**Decision and Order**

**Board of Registered Nursing Case No. 2001-78**

**BEFORE THE  
BOARD OF REGISTERED NURSING  
DEPARTMENT OF CONSUMER AFFAIRS  
STATE OF CALIFORNIA**

LONNIE CHARLES LAUGHLIN  
P.O. Box 988  
Spring Valley, CA 91976

Registered Nurse License No. 512650

Respondent.

Case No. 2001-78

OAH No.

**DECISION AND ORDER**

The attached Stipulated Settlement and Disciplinary Order is hereby adopted by the Board of Registered Nursing of the Department of Consumer Affairs, as its Decision in the above entitled matter.

This Decision shall become effective on March 3, 2002.

It is so ORDERED February 1, 2002.

*Landra L. Erickson*

\_\_\_\_\_  
FOR THE BOARD OF REGISTERED NURSING  
DEPARTMENT OF CONSUMER AFFAIRS



1 BILL LOCKYER, Attorney General  
of the State of California  
2 RICHARD D. GARSKE, State Bar No. 50569  
Deputy Attorney General  
3 California Department of Justice  
110 West "A" Street, Suite 1100  
4 San Diego, California 92101  
5 P.O. Box 85266  
San Diego, California 92186-5266  
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Facsimile: (619) 645-2061

7 Attorneys for Complainant  
8

9 **BEFORE THE**  
10 **BOARD OF REGISTERED NURSING**  
11 **DEPARTMENT OF CONSUMER AFFAIRS**  
**STATE OF CALIFORNIA**

12 In the Matter of the Accusation Against:

13 LONNIE CHARLES LAUGHLIN  
P.O. Box 988  
14 Spring Valley, CA 91976

15 Registered Nurse License No. 512650

16 Respondent.  
17

Case No. 2001-78

OAH No. 1-2001010507

**STIPULATED SETTLEMENT AND  
DISCIPLINARY ORDER**

18 IT IS HEREBY STIPULATED AND AGREED by and between the parties to the  
19 above-entitled proceedings that the following matters are true:  
20

21 PARTIES

22 1. Complainant Ruth Ann Terry, M.P.H., R.N. is the Executive Officer of the  
23 Board of Registered Nursing. She brought this action solely in her official capacity and is  
24 represented in this matter by Bill Lockyer, Attorney General of the State of California, by  
25 Richard D. Garske, Deputy Attorney General.

26 2. Respondent Lonnie Charles Laughlin ("Respondent") is represented in this  
27 proceeding by attorney Joseph L. Rubin, whose address is Attorney at Law, 160 Thorn Street  
28 #2A, San Diego, CA 92103.

3. On or about July 11, 1995, the Board of Registered Nursing issued Registered Nurse License No. 512650 to Lonnie Charles Laughlin ("Respondent"). The license will expire January 31, 2003, unless renewed.

## JURISDICTION

4. Accusation No. 2001-78, was filed before the Board of Registered Nursing of the Department of Consumer Affairs, ("Board"), and is currently pending against Respondent. The Accusation, together with all other statutorily required documents, was duly served on Respondent on October 10, 2000, and Respondent timely filed his Notice of Defense contesting the Accusation. A copy of Accusation No. 2001-78 is attached as Exhibit A and incorporated herein by reference.

## ADVISEMENT AND WAIVERS

5. Respondent has carefully read and discussed with his counsel the nature of the charges and allegations in the Accusation and the effects of this Stipulated Settlement and Disciplinary Order.

6. Respondent is fully aware of his legal rights in this matter, including the right to a hearing on the charges and allegations in the Accusation, the right to be represented by counsel, at his own expense, the right to confront and cross-examine the witnesses against him, the right to present evidence and to testify on his own behalf, the right to the issuance of subpoenas to compel the attendance of witnesses and the production of documents, the right to reconsideration and court review of an adverse decision, and all other rights accorded by the California Administrative Procedure Act and other applicable laws.

7. Respondent voluntarily, knowingly and intelligently waives and gives up each and every right set forth above.

CULPABILITY

8. Respondent understands that the charges and allegations in the Accusation, if proven at a hearing, constitute cause for imposing discipline upon his Registered Nurse License No. 512650.

9. Respondent admits the truth of each and every charge and allegation in the Accusation No. 2001-78.

10. Respondent agrees that his Registered Nurse License No. 512650 is subject to discipline and he agrees to be bound by the Board's imposition of discipline as set forth in the Order below.

RESERVATION

11. The admissions made by Respondent herein are only for the purposes of this proceeding, or any other proceedings in which the Board of Registered Nursing or other professional licensing agency is involved, and shall not be admissible in any other criminal or civil proceeding.

## CONTINGENCY

12. This stipulation shall be subject to the approval of the Board. Respondent understands and agrees that Board of Registered Nursing's staff and counsel for Complainant may communicate directly with the Board regarding this stipulation and settlement, without notice to or participation by Respondent or his counsel. If the Board fails to adopt this stipulation as its Order, except for this paragraph the Stipulated Settlement and Disciplinary Order shall be of no force or effect, it shall be inadmissible in any legal action between the parties, and the Board shall not be disqualified from further action by having considered this matter.

13. The parties agree that facsimile copies of this Stipulated Settlement and Disciplinary Order, including facsimile signatures thereto, shall have the same force and effect as the original Stipulated Settlement and Disciplinary Order and signatures.

14. In consideration of the foregoing admissions and stipulations, the parties agree that the Board shall, without further notice or formal proceeding, issue and enter the following Disciplinary Order:

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**SEVERABILITY CLAUSE** - Each term and condition of probation contained herein is a separate and distinct term and condition. If any term and condition of this Order, or any application thereof, is declared unenforceable in whole, in part, or to any extent, the remainder of this Order, and all other applications thereof, shall not be affected. Each term and condition of this Order shall separately be valid and enforceable to the fullest extent permitted by law.

(2) **COMPLY WITH PROBATION PROGRAM** - Respondent shall fully comply with the terms and conditions of the Probation Program established by the Board and cooperate with representatives of the Board in its monitoring and investigation of the respondent's compliance with the Probation Program. Respondent shall inform the Board in writing within no more than 15 days of any address change and shall at all times maintain an active, current license status with the Board, including during any period of suspension.

**(4) RESIDENCY OR PRACTICE OUTSIDE OF STATE** - Periods of residency or practice as a registered nurse outside of California will not apply to the reduction of this probationary term. The respondent must provide written notice to the Board within 15 days of any change of residency or practice outside the state.

1                   **(5) SUBMIT WRITTEN REPORTS** - Respondent, during the period of  
2 probation, shall submit or cause to be submitted such written reports/declarations and verification  
3 of actions under penalty of perjury, as required by the Board. These reports/declarations shall  
4 contain statements relative to respondent's compliance with all the terms and conditions of the  
5 Board's Probation Program. Respondent shall immediately execute all release of information  
6 forms as may be required by the Board or its representatives.

7                   **PROVIDE DECISION**

8 Respondent shall provide a copy of this decision to the nursing regulatory agency in every state and  
9 territory in which he or she has a registered nurse license.

10                   **(6) FUNCTION AS A REGISTERED NURSE** - Respondent, during the period  
11 of probation, shall engage in the practice of registered nursing in California for a minimum of 20  
12 hours per week for 7 consecutive months or as determined by the Board. For purposes of  
13 compliance with the section, "engage in the practice of registered nursing" may include, when  
14 approved by the Board, volunteer work as a registered nurse, or work in any non-direct patient care  
15 position that requires licensure as a registered nurse. The Board may require that advanced practice  
16 nurses engage in advanced practice nursing for a minimum of 20 hours per week for 7 consecutive  
17 months or as determined by the Board. If respondent has not complied with this condition during  
18 the probationary term, and the respondent has presented sufficient documentation of his good faith  
19 efforts to comply with this condition, and if no other conditions have been violated, the Board, in its  
20 discretion, may grant an extension of the respondent's probation period up to one year without  
21 further hearing in order to comply with this condition.

22                   **(7) EMPLOYMENT APPROVAL AND REPORTING REQUIREMENTS -**

23 Respondent shall obtain prior approval from the Board before commencing any employment, paid  
24 or voluntary, as a registered nurse. Respondent shall cause to be submitted to the Board all  
25 performance evaluations and other employment related reports as a registered nurse upon request of  
26 the Board. Respondent shall provide a copy of this decision to his employer and immediate  
27 supervisor prior to commencement of any nursing or other health care related employment.  
28 Respondent shall notify the Board in writing within seventy-two (72) hours after he obtains any

nursing or other health care related employment, when such employment is not as a registered nurse. Respondent shall notify the Board in writing within seventy-two (72) hours after he is terminated from any registered nursing, other nursing, or other health care related employment with a full explanation of the circumstances surrounding the termination.

(8) **SUPERVISION** - Respondent shall obtain prior approval from the Board regarding respondent's level of supervision and/or collaboration before commencing any employment as a registered nurse. Respondent shall practice only under the direct supervision of a registered nurse in good standing (no current discipline) with the Board of Registered Nursing, unless alternative methods of supervision and/or collaboration (e.g., with an advanced practice nurse or physician) are approved. Respondent's level of supervision and/or collaboration may include, but is not limited to the following:

(a) Maximum - The individual providing supervision and/or collaboration is present in the patient care area or in any other work setting at all times.

(b) Moderate - The individual providing supervision and/or collaboration is in the patient care unit or in any other work setting at least half the hours respondent works.

(c) Minimum - The individual providing supervision and/or collaboration has person-to-person communication with respondent at least twice during each shift worked.

(d) Home Health Care - If respondent is approved to work in the home health care setting, the individual providing supervision and/or collaboration shall have person-to-person communication with respondent as required by the Board each work day. Respondent shall maintain telephone or other telecommunication contact with the individual providing supervision and/or collaboration as required by the Board during each work day. The individual providing supervision and/or collaboration shall conduct, as required by the Board, periodic, on-site visits to patients' homes visited by the respondent with or without respondent present.

(9) **EMPLOYMENT LIMITATIONS** - Respondent shall not work for a nurse's registry, in any private duty position as a registered nurse, a temporary nurse placement agency, or for an in-house nursing pool. Respondent shall not work for a licensed home health agency as a

1 visiting nurse unless the registered nursing supervision and other protections for home visits have  
2 been approved by the Board. Respondent shall not work in any other registered nursing occupation  
3 where home visits are required. Respondent shall not work in any health care setting as a  
4 supervisor of registered nurses. The Board may additionally restrict respondent from supervising  
5 licensed vocational nurses and/or unlicensed assistive personnel on a case-by-case basis.  
6 Respondent shall not work as a faculty member in an approved school of nursing or as an instructor  
7 in a Board approved continuing education program. Respondent shall work only on a regularly  
8 assigned, identified and predetermined worksite(s) and shall not work in a float capacity.

9 If the respondent is working or intends to work in excess of 40 hours per week, the Board may  
10 request documentation to determine whether there should be restrictions on the hours of work.

11 (10) **COMPLETE A NURSING COURSE(S)** - Respondent, at his own  
12 expense, shall enroll and successfully complete a course(s) relevant to the practice of registered  
13 nursing no later than six months prior to the end of his probationary term. Respondent shall obtain  
14 prior approval from the Board before enrolling in the course(s). Respondent shall submit to the  
15 Board the original transcripts or certificates of completion for the above required course(s). The  
16 Board shall return the original documents to respondent after photocopying them for its records.

17 (11) **COST RECOVERY** - Respondent shall pay to the Board costs associated  
18 with its investigation and enforcement pursuant to Business and Professions Code Section 125.3 in  
19 the amount of \$500.00. Respondent shall be permitted to pay these costs in a payment plan  
20 approved by the Board, with payments to be completed no later than three months prior to the end  
21 of the probation term.

22 (12) **VIOLATION OF PROBATION** - If a respondent violates the conditions of  
23 his probation, the Board after giving the respondent notice and an opportunity to be heard, may set  
24 aside the stay order and impose the stayed discipline (revocation) of the respondent's license.

25 If during the period of probation, an accusation or petition to revoke probation has  
26 been filed against respondent's license or the Attorney General's Office has been requested to  
27 prepare an accusation or petition to revoke probation against the respondent's license, the  
28 probationary period shall automatically be extended and shall not expire until the accusation or

petition has been acted upon by the Board. Upon successful completion of probation, the respondent's license will be fully restored.

(13) **THERAPY OR COUNSELING PROGRAM** - Respondent, at his expense, shall participate in an on-going counseling program until such time as the Board releases him from this requirement and only upon the recommendation of the counselor. Written progress reports from the counselor will be required at various intervals.

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ACCEPTANCE

I have carefully read the above Stipulated Settlement and Disciplinary Order and have fully discussed the terms and conditions and other matters contained therein with my attorney Joseph L. Rubin. I understand the effect this stipulation will have on my Registered Nurse License No. 512650. I enter into this Stipulated Settlement voluntarily, knowingly and intelligently and agree to be bound by the Disciplinary Order and Decision of the Board of Registered Nursing. I further agree that a facsimile copy of this Stipulated Settlement and Disciplinary Order, including facsimile copies of signatures, may be used with the same force and effect as the originals.

DATED: 7/13/2001

  
LONNIE CHARLES LAUGHLIN  
Respondent

DATED: 7/13/2001

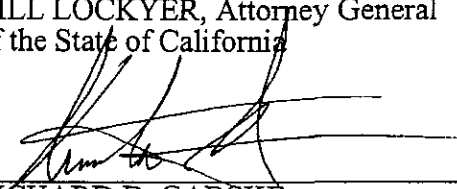
  
JOSEPH L. RUBIN  
Attorney for Respondent

1 ENDORSEMENT

2 The foregoing Stipulated Settlement and Disciplinary Order is hereby respectfully  
3 submitted for consideration by the Board of Registered Nursing of the Department of Consumer  
4 Affairs.

5 DATED: 7/13/01  
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10 BILL LOCKYER, Attorney General  
of the State of California

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13 RICHARD D. GARSKE  
Deputy Attorney General

14 Attorneys for Complainant  
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**Exhibit A:**  
**Accusation Case No. 2001-78**

BILL LOCKYER, Attorney General  
of the State of California  
RICHARD D. GARSKE, State Bar No. 50569  
Deputy Attorney General  
110 West "A" Street, Suite 1100  
P.O. Box 85266  
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Facsimile: (619) 645-2061

Attorneys for Complainant

BEFORE THE  
BOARD OF REGISTERED NURSING  
DEPARTMENT OF CONSUMER AFFAIRS  
STATE OF CALIFORNIA

In the Matter of the Accusation Against:	)	NO. 2001-78
	)	
<b>LONNIE CHARLES LAUGHLIN</b>	)	
P.O. Box 988	)	<b><u>ACCUSATION</u></b>
Spring Valley, California 91976	)	
Registered Nurse License No. 512650	)	
	)	
Respondent.	)	

Ruth Ann Terry, M.P.H., R.N., for causes for discipline, alleges:

1. Complainant Ruth Ann Terry, M.P.H., R.N., makes and files this  
Accusation in her official capacity as Executive Officer, Board of Registered Nursing,  
Department of Consumer Affairs.

**LICENSE INFORMATION**

2. On July 11, 1995, the Board of Registered Nursing issued registered nurse  
license number 512650, to Lonnie Charles Laughlin (respondent herein). The license will expire  
on January 31, 2001, unless renewed.

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1 OTHER MATTERS

2 9. To determine the degree of penalty, if any, to be imposed on respondent,  
3 complainant alleges that on May 23, 1990, respondent was convicted by the court on his plea of  
4 guilty to a violation of Penal Code section 594(a)(b)4 (vandalism under \$1,000), in the  
5 Municipal Court of San Diego County, El Cajon Judicial District, in case number C 108264,  
6 entitled *People vs. Lonnie Charles Laughlin*.

7 The circumstances of the crime for which respondent was convicted are that on or  
8 about April 20, 1990, during a verbal altercation following a minor traffic accident, respondent  
9 made a scratch approximately 6 inches long to the side of M.T.'s vehicle.


10 **WHEREFORE**, complainant prays that a hearing be held and that the Board of  
11 Registered Nursing make its order:

12 1. Revoking or suspending registered nurse license number 512650, issued to  
13 Lonnie Charles Laughlin.

14 2. Ordering Lonnie Charles Laughlin to pay to the Board of Registered  
15 Nursing its costs in investigating and enforcing the case according to proof at the hearing,  
16 pursuant to Business and Professions Code section 125.3.

17 3. Taking such other and further action as may be deemed proper and  
18 appropriate.

19  
20 DATED: 9/19/00

21   
22 RUTH ANN TERRY, M.H., R.N.  
23 Executive Officer  
24 Board of Registered Nursing  
25 Department of Consumer Affairs  
26 State of California

27 Complainant

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SD2000AD0182  
27 (ps) 9/12/00